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6 Attorneys for Plaintiff
RONALD CUPP

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8 **UNITED STATES DISTRICT COURT**
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10 **NOTHERN DISTRICT OF CALIFORNIA – OAKLAND DIVISION**

11 RONALD CUPP, an individual,
12 Plaintiff,

13 vs.

14 COUNTY OF SONOMA, a municipal
corporation; TENNIS WICK, in his
individual and official capacities; TYRA
15 HARRINGTON, in her individual and official
capacities; MARK FRANCESCHI, in his
individual and official capacities; TODD
16 HOFFMAN, in his individual and official
capacities; JESSE CABLK, in his individual
and official capacities; ANDREW SMITH, in
17 his individual and official capacities; and
DOES 1-50, inclusive.

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19 Defendants.

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21 CASE NO.: 4:23-cv-01007-JST

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23 **STIPULATION OF PARTIES TO
EXTEND TIME FOR FILLING
OPPOSITION TO MOTION TO
DISMISS COMPLAINT AND
REPLY TO OPPOSITION TO
MOTION TO DISMISS
COMPLAINT**

24 Date: June 29, 2023
Time: 2:00 p.m.
Courtroom: 6, 2nd Floor
Judge: Jon S. Tigar

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26 IT IS STIPULATED AND AGREED, by and between the parties, through their respective
counsel, to request that the Court extend the time for filing Plaintiff RONALD CUPP's
opposition and response to Defendant COUNTY OF SONOMA's Motion to Dismiss Complaint
(DOC 12) by one (1) day to April 20, 2023 by 5:00 p.m. This short extension is respectfully
requested due to Plaintiff's counsel trial and deposition schedule, which has delayed and

27
28 **STIPULATION OF PARTIES TO EXTEND TIME FOR FILLING OPPOSITION TO
MOTION TO DISMISS COMPLAINT AND REPLY TO OPPOSITION TO MOTION TO
DISMISS COMPLAINT**

1 interfered with counsel's ability to complete Plaintiff's opposition and response to Defendant's
2 Motion to Dismiss.

3 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, through
4 their respective counsel, to request that the Court also extend the time for filing Defendant
5 COUNTY OF SONOMA's reply papers in support of the Motion to Dismiss Complaint.

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7 Respectfully submitted,

8 Dated: April 19, 2023

YOUNG LAW GROUP

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10 By: /s/Eric G. Young, Esq.

11 ERIC G. YOUNG, ESQ., Attorneys for
12 Plaintiff RONALD CUPP

13 Dated: April 19, 2023

14 ROBERT H. PITMANN, County Counsel

15
16 By: /s/Joshua A. Myers

17 Josh A. Myers
18 Chief Deputy County Counsel
19 Attorneys for Defendant COUNTY OF
20 SONOMA

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28 STIPULATION OF PARTIES TO EXTEND TIME FOR FILLING OPPOSITION TO
MOTION TO DISMISS COMPLAINT AND REPLY TO OPPOSITION TO MOTION TO
DISMISS COMPLAINT



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3 **[PROPOSED] ORDER**

4 Pursuant to the Stipulation of the parties, it is hereby ordered that Plaintiff RONALD
5 CUPP's time for filing opposition and response papers to Defendant COUNTY OF SONOMA's
6 Motion to Dismiss Complaint (DOC 12) is extended to April 20, 2023 by 5:00 p.m. Defendant
7 COUNTY OF SONOMA's time for filing any reply papers in support of the Motion to Dismiss
8 Complaint is also extended to April 27, 2023 by 5:00 p.m.
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11 Dated: _____
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 JUDGE JON S. TIGAR
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STIPULATION OF PARTIES TO EXTEND TIME FOR FILING OPPOSITION TO
MOTION TO DISMISS COMPLAINT AND REPLY TO OPPOSITION TO MOTION TO
DISMISS COMPLAINT

CERTIFICATE OF SERVICE

**Case Name: Cupp v County of Sonoma
Case Number:**

I am employed in the County of Sonoma, State of California. I am over the age of 18 and not a party to the within action. My business address is 2544 Cleveland Avenue, Santa Rosa, CA 95403.

On April 19, 2023, I served the following identified document(s):

**STIPULATION OF PARTIES TO EXTEND TIME FOR FILING OPPOSITION
TO MOTION TO DISMISS COMPLAINT AND REPLY TO OPPOSITION TO
MOTION TO DISMISS COMPLAINT**

I served the document(s) on all interested parties as follows:

Name of Party/Counsel Served:

Attorney For:

ROBERT H. PITTMAN County Counsel MICHAEL A. KING Deputy County Counsel County of Sonoma 575 Administration Drive, Room 105A Santa Rosa, California 95403 Telephone: (707) 565-2421 Facsimile: (707) 565-2624 E-mail: michael.king@sonoma-county.org Megan.SaldanaSweeley@sonoma-county.org	Defendant COUNTY OF SONOMA
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I served the above-named documents as follows:

BY FACSIMILE TRANSMISSION - pursuant to agreement of the parties, from fax number (707) 520-7272 to the fax number(s) set forth above. The facsimile machine I used complied with Rule 2.301(3) and no error was reported by the machine. Pursuant to Rule 2.306(h)(4), I caused the machine to print a transmission record, a copy of which is attached.

BY MAIL -

By personally depositing the documents in a sealed envelope addressed as set forth above with the U.S. Postal Service, postage fully prepaid.

By placing documents enclosed in a sealed envelope addressed as set forth above for collection and mailing. I am readily familiar with my firm's practice of collection and processing correspondence for mailing. In the ordinary course of my firm's business, correspondence is deposited with U.S. postal service on the same day it is placed for collection, postage fully prepaid.

BY PERSONAL SERVICE - by delivering a copy of the document(s) by hand to the addressee.

BY EXPRESS SERVICE - by depositing in a box or other facility regularly maintained by the express service carrier or delivering to an authorized courier or driver authorized by the express service

1 carrier to receive documents, in an envelope or package designated by the express service carrier with
2 delivery fees paid or provided for, addressed to the person on whom it is to be served.

3 **BY ELECTRONIC TRANSMISSION** - By electronically serving the document(s) to the
4 electronic mail address set forth below on this date before 11:59:59 p.m. pursuant to and consistent with
5 Code of Civil Procedure §§1010.6(a)(2), (4), (5) and 1010.6(e).

6 I declare under penalty of perjury under the laws of the State of California that the foregoing is
7 true and correct.

8 I declare under penalty of perjury under the laws of the United States of America that the
9 foregoing is true and correct.

10 Date: April 19, 2023

YOUNG LAW GROUP

11 */S/ Jackie Campbell*
12 Jackie Campbell